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April 29, 2005

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

Attention: Wireline Competition Bureau

**Re: Centennial USVI Operations Corp.
Petition for Designation as an Eligible Telecommunications
Carrier in the United States Virgin Islands
CC Docket 96-45**

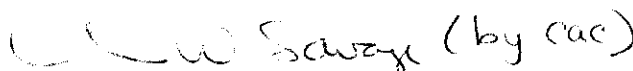
Dear Ms. Dortch:

On behalf of Centennial USVI Operations Corp., enclosed is its Petition for Designation as an Eligible Telecommunications Carrier in the United States Virgin Islands.

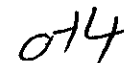
Please note that Exhibit D of the Petition has been submitted under seal. A Request for Confidential treatment of Exhibit D is being filed simultaneously with the Commission.

Should there be any questions regarding this matter, please contact the undersigned.

Sincerely,


Christopher W. Savage

Enclosures
cc: William Roughton (w/enclosures)


[Illegible stamp]

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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APR 29 2005

Federal Communications Commission
Office of Secretary

In the Matter of

Federal-State Joint Board on Universal Service

Centennial USVI Operations Corp. Petition for
Designation as an Eligible
Telecommunications Carrier in the United
States Virgin Islands

CC Docket No. 96-45

To: Wireline Competition Bureau

**PETITION FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN THE UNITED STATES VIRGIN ISLANDS**

Centennial USVI Operations Corp. ("Centennial"), by its counsel and pursuant to 47 U.S.C. § 214(e)(6), hereby petitions the Commission for designation as an Eligible Telecommunications Carrier ("ETC") in the United States Virgin Islands (the "USVI"). Centennial requests that it be designated as eligible to receive support from the Universal Service Fund ("USF") including, but not limited to, support for rural, insular and high-cost areas and low-income customers. As demonstrated below, Centennial fully satisfies the statutory and regulatory prerequisites for ETC designation, and designating Centennial as an ETC in the USVI will serve the public interest.¹

¹ Centennial is of course aware that the Commission has recently issued an order clarifying and revising the rules applicable to carriers seeking ETC designation from the Commission. Federal-State Joint Board on Universal Service, *Report and Order*, CC Docket No. 96-45 (released March 17, 2005) ("*ETC Order*"). According to that ruling, the new requirements it establishes do not apply to ETC petitions pending at the Commission prior to the effective date of the new rules. *See* new proposed 47 C.F.R. § 54.202(a) (noting that new requirements apply "on or after the effective date of" the new rules). As Centennial understands it, the governing law on ETC applications for rural areas, such as this one, is as stated in the *Virginia Cellular Order*. *See* Federal-State Joint Board on Universal Service; Virginia Cellular, Inc., Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia, *Report and Order*, CC Docket No. 96-45, 19 FCC Rcd 1563, 1570, 1584 at ¶¶ 15, 46 (2004)

I. DESCRIPTION OF CENTENNIAL.

Centennial is a wholly owned subsidiary of Centennial Communications Corp., a publicly traded, independent, regional communications service provider.² Centennial Puerto Rico License Corp. holds the B block broadband PCS license for MTA 25, which covers Puerto Rico and the USVI. Pursuant to this authorization, Centennial serves Puerto Rico and the islands of St. Thomas, St. Croix and St. John. Attached as Exhibit A hereto are maps showing Centennial's complete service area in the USVI.

As a CMRS carrier, Centennial is eligible to seek designation as an ETC.³ Since 1997, Centennial has held ETC designations and received federal high-cost support in neighboring Puerto Rico, both as a facilities-based competing local exchange carrier and as a CMRS provider. In addition, Centennial's affiliates in the continental United States hold both rural and non-rural ETC designations in Indiana, Michigan, Mississippi, and Louisiana. Indeed, in Louisiana, Centennial is the *only* entity that provides *any* telecommunications services in certain

("Virginia Cellular Order"). Even so, Centennial has made a good faith effort to address the requirements of the new rules. As far as Centennial is aware, no other ETC applicant has yet done so, and, obviously, the Commission has not yet processed any ETC petitions under those rules. In these circumstances, while Centennial urges the Commission to promptly consider and act upon this petition, Centennial stands ready to meet with the staff and answer any questions that may exist surrounding this petition, whether such questions arise under the new rules or under *Virginia Cellular*.

² In the continental United States, Centennial Communications Corp. (through various subsidiaries) offers cellular service to more than 500,000 subscribers in thirty markets covering six states (Texas, Mississippi, Louisiana, Ohio, Indiana, and Michigan). Centennial's operations in the Caribbean serve more than 600,000 subscribers and include operations in Puerto Rico, the Dominican Republic and the United States Virgin Islands. In Puerto Rico, in addition to offering CMRS services throughout the island, Centennial is the only facilities-based CLEC, with an extensive fiber optic network interconnected to all of the incumbent carrier's host end office switches, and serving over 250,000 access line equivalents using its own facilities.

³ Federal-State Joint Board on Universal Service, *First Report and Order*, CC Docket No. 96-45, 12 FCC Rcd 8776, 8858-59 (1997). See also *ETC Order, supra*; *Virginia Cellular, supra*.

highly rural areas.⁴ Centennial, therefore, is quite familiar with the requirements and obligations associated with rural ETC status.

In the case of the USVI, designating Centennial as an ETC will allow Centennial to receive high-cost support, which it will use to upgrade and expand its current network in the USVI, thereby providing better services to this rural, insular region; enhance its ability to more quickly deploy advanced services; and enable it to offer residents a viable competitive alternative to the incumbent carrier. Although Centennial would certainly undertake routine maintenance and upgrades of its USVI network in any event, the economics of operating a wireless network in the USVI make it economically unfeasible for Centennial to undertake the robust cell site expansions and network upgrades that will be possible with USF support. Centennial's specific plans for the USVI following ETC designation include adding new cell sites; reconfiguring its existing network with third generation cellular technology to improve coverage and capacity, upgrading transmission capacity between and among cell sites and Centennial's mobile switching center ("MSC"), as well as the implementation of wireless data and other advanced services. Moreover, because Centennial will operate its Puerto Rico and USVI systems on an integrated basis as a technical matter, its USVI customers will automatically receive "local" calling privileges that include all of Puerto Rico as well as all of the USVI. This will provide added benefits to all of Centennial's USVI customers, including Lifeline and Link Up customers.

⁴ See ruling of the Louisiana PSC directing Centennial to extend service to the unserved areas of Shaw and Blackhawk, Louisiana. Centennial Lafayette Communications, LLC; Centennial Beauregard Cellular, LLC; Centennial Hammond Cellular, LLC; Centennial Caldwell Cellular Corp.; Centennial Morehouse Cellular, LLC, Docket No. U-27174, In re: Application for designation as an [ETC] pursuant to Section 214(e)(6) of the Communications Act of 1934 for the purposes of receiving federal universal service support in Louisiana (on reconsideration), Order. No. U-27174 (effective as of January 14, 2004; issued May 12, 2004).

II. IDENTIFICATION OF THE GEOGRAPHIC AREA FOR WHICH ETC DESIGNATION IS SOUGHT.

Centennial requests ETC designation for the entire USVI, which includes the islands of St. Thomas, St. John and St. Croix. The incumbent local exchange carrier serving the USVI, the Virgin Islands Telephone Company d/b/a Innovative Telephone ("Vitelco"), is considered a rural telephone company under Section 51.5 of the Commission's rules. With respect to ETC designations in the service areas of rural telephone companies, the Commission's rules require the ETC service areas to encompass the incumbent telephone company's entire study area unless and until the Commission specifically redefines such area for purposes of ETC designation.⁵ Centennial requests ETC designation for Vitelco's entire study area.⁶

III. CENTENNIAL SATISFIES THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS AN ETC IN THE USVI.

Centennial satisfies each of the elements required for ETC designation set forth in the FCC's *Section 214(e)(6) Public Notice*,⁷ as supplemented and clarified by the *Virginia Cellular Order* and other applicable Commission rulings. These are addressed below.

⁵ 47 C.F.R. §54.207(b).

⁶ The *ETC Order* calls for ETC applicants to make certain reports and projections on a wire center basis. As of the date of this petition, Centennial has been unable to obtain any maps that break down the USVI into separate wire centers, despite having sought such information from (for example) NECA and the USVI public service commission. That said, Centennial is seeking ETC designation for all of the USVI; it operates its USVI network on an integrated basis; and there is only one incumbent carrier, Vitelco, which services the entire USVI. In these circumstances, Centennial submits that there is no need to subdivide the USVI into wire centers for purposes of considering this petition. To the extent that treating the USVI as an entire whole, not broken down into wire centers, calls for a waiver of any applicable Commission rule, Centennial respectfully requests such a waiver at this time.

⁷ See Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act, *Public Notice*, 12 FCC Rcd 22947 (1997) ("*Section 214(e)(6) Public Notice*").

A. Centennial Is Not Subject To The Jurisdiction Of The Virgin Islands Public Service Commission.

Section 214(e)(6) of the Communications Act of 1934, as amended (the “Act”) directs the Commission, upon request, to designate as an ETC “a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State Commission.”⁸ The Commission will consider a request for ETC designation from a carrier that provides the Commission with an “affirmative statement” from the relevant state commission or a court of competent jurisdiction that the state lacks jurisdiction to perform the designation.⁹ In fulfillment of this requirement, attached is a copy of letter from the Virgin Islands Public Service Commission (“VIPSC”) to Chairman Martin, indicating that the VIPSC lacks jurisdiction over Centennial, and specifically lacks such jurisdiction for purposes of ETC designation.

B. Centennial Offers All Of The Services Supported By The High-Cost Universal Service Program.

Centennial provides all of the services and functionalities supported by the federal universal service program, as enumerated in Section 54.101(a) of the Commission’s rules, throughout the USVI. Once designated as an ETC, Centennial will make Lifeline and Link-Up services available to qualifying low-income customers in the USVI, as required by Section 54.405 of the Commission’s rules. Centennial will publicize the availability of Lifeline and Link Up in a manner reasonably designed to reach those USVI residents likely to qualify for the discounts. As described below (and in the Declaration attached as Exhibit B hereto), Centennial

⁸ 47 U.S.C. §214(e)(6).

⁹ Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas, *Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking*, CC Docket No. 96-45, 15 FCC Rcd 12208, 12264, at ¶ 113 (2000).

now provides, or will provide upon ETC designation, the supported services throughout the USVI over its existing network infrastructure and spectrum.

This Commission has identified the following services and functionalities as the core services to be offered by an ETC and supported by federal universal service support mechanisms:

1. Voice-grade access to the public switched telephone network;
2. Local usage;
3. Dual tone multi-frequency signaling or its functional equivalent;
4. Single-party service or its functional equivalent;
5. Access to emergency services;
6. Access to operator services;
7. Access to interexchange service;
8. Access to directory assistance; and
9. Toll limitation for qualifying low-income consumers.

47 C.F.R. §54.101(a). Centennial provides, or, upon ETC designation, will provide, each of these services, as described below.

1. Voice-Grade Access To The Public Switched Telephone Network. The Commission has defined voice grade access as “a functionality that enables a user of telecommunications service to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating that there is an incoming call. Bandwidth for voice grade access should be, at a minimum, 300 to 3000 Hertz.” 47 C.F.R. § 54.101(a)(1). Centennial provides voice grade access to the PSTN by means of its various interconnection agreements with Vitelco and with the Puerto Rico Telephone Company, as well as its provision of access services to long distance carriers.¹⁰

¹⁰ As noted above, Centennial operates its Puerto Rico and USVI wireless systems on an integrated basis. In light of this technical arrangement, Centennial provides its USVI customers

2. Local Usage. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. The Commission defines local usage as “an amount of minutes of use of exchange service, prescribed by the Commission, provided free of charge to end users.” 47 C.F.R. 54.101 (a)(2). A carrier seeking ETC designation is not required to offer unlimited local usage, and the Commission has not established a minimum amount of local usage required to be included in a universal service offering. Centennial offers a variety of rate plans in the USVI that provide local usage. Attached hereto as Exhibit C is a description of Centennial’s current rate plans for the USVI; all of which include some minimum local usage.

3. Dual-Tone, Multi-Frequency (“DTMF”) Signaling, or its Functional Equivalent. DTMF is defined as “a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time.” 47 C.F.R. § 54.101(a)(4). Consistent with the principles of competitive and technological neutrality, the Commission permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement. Centennial currently uses out-of-band digital signaling and in-band multi-frequency (“MF”) signaling that is functionally equivalent to DTMF signaling. Centennial also has the ability to pass DTMF signaling over its CDMA system. Centennial therefore meets the requirement to provide DTMF signaling or its functional equivalent.

4. Single-Party Service or its Functional Equivalent. Single-party service or its functional equivalent is defined as a “telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or in the case of wireless telecommunications carriers, which use spectrum shared among users to provide

with local calling privileges to and from Puerto Rico. This supports the conclusion that granting Centennial ETC status is in the public interest. *See infra.*

service, a dedicated message path for the length of a user's particular transmission." 47 C.F.R. §54.101(a)(4). Centennial provides single-party service or its equivalent by providing a dedicated message path for the length of all customer calls.

5. Access to Emergency Services. Access to emergency services "includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems." 47 C.F.R. § 54.101(a)(5). Centennial currently provides all of its customers with access to emergency service by dialing "911," and is implementing E911 services consistent with the Commission's rules. To date, no public emergency service provider (PSAP) in the USVI has made a request for either Phase I or Phase II E911 service. That said, Centennial is fully prepared to implement E911 services when the PSAP(s) in the USVI are prepared to make use of such services. For example, in Puerto Rico, Centennial has worked with the PSAP and has successfully implemented Phase I and Phase II E911 service.

6. Access to Operator Services. Access to operator services is defined as "access to an automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call." 47 C.F.R. §54.101(a)(6). Centennial provides access to operator services through itself or other entities. Centennial currently has an arrangement with Verisign, an outside contractor, which provides automated operator assistance services, pursuant to which a customer can dial "0" and receive automated assistance to place a call with a credit card, calling card or prepaid card, or make a collect call. A customer may also dial "611" and be connected to a representative of Centennial's call center, who can place the call for the customer.

7. Access to Interexchange Service. Access to interexchange service is defined as "the use of the loop, as well as that portion of switch that is paid for by the end user, or the

functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network." 47 C.F.R. § 54.101(a)(7). Centennial provides all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with several interexchange carriers ("IXCs"). Also, customers can reach their IXC of choice by dialing the appropriate access code.

8. Access to Directory Assistance. Access to directory assistance is defined as "access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings." 47 C.F.R. §54.101(a)(8). Centennial provides its customers with access to directly assistance by dialing "411" or "555-1212."

9. Toll Limitation for Qualifying Low-Income Consumers. An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no charge. 47 C.F.R. §54.101(a)(9) and §54.401(3). Once designated as an ETC, Centennial will offer toll blocking limitation services to Lifeline customers in satisfaction of the Commission's requirement. Currently, Centennial provides toll-blocking services for international calls and customer selected toll calls. Accordingly, Centennial has the technology to provide toll blocking and will use this technology to offer the service, at no charge, to Lifeline customers.

C. Centennial Will Offer The Supported Services Using Its Own Facilities.

A carrier requesting ETC designation must certify that it offers the supported services "either using its own facilities or a combination of its own facilities and resale of another carrier's services."¹¹ Centennial will provide the supported services using its existing network infrastructure, which includes the same antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities currently used by the company to serve its PCS customers in the USVI.

¹¹ Section 214(e)(6) Public Notice, at 22949.

See Exhibit B attached hereto. Moreover, as described in the attached 5-year plan, Centennial will use the USF support it receives as an ETC to substantially upgrade and improve those facilities.

D. Centennial Will Advertise The Availability of Supported Services.

Centennial will advertise the availability of the supported services and the corresponding charges in a manner that fully informs the general public within the designated service area of the services and charges. Centennial currently advertises its wireless services through several different media, including newspaper, television and radio. Centennial will publicize the availability of Lifeline and Link-up service and improved service in unserved or underserved areas. Specifically, Centennial will make available information regarding Lifeline and Link-up service in locations where qualified, underserved customers are likely to find such information useful, including unemployment, community health, social security and welfare offices within the USVI so that consumers who may not have telephone service can learn about Centennial's service and the availability of Lifeline and Link-up discounts.

IV. CENTENNIAL MEETS THE ADDITIONAL ELIGIBILITY REQUIREMENTS FOR ETC DESIGNATION RECENTLY ADOPTED BY THE COMMISSION

As noted above, the new requirements articulated in the *ETC Order* are not yet legally effective and therefore do not, formally, apply to this petition. Even so, Centennial believes that it meets those new requirements, either literally or in all material respects.¹² On the assumption

¹² As noted above, certain of the requirements in the *ETC Order* refer to making projections and reports on a wire center basis. Unfortunately, Centennial has been unable to obtain maps or other information showing precisely how the USVI is subdivided into different wire centers. That said, as noted above, since Centennial is seeking ETC designation for the entire USVI and since it operates its wireless network on an integrated basis, it would appear that the wire-center specific information would not be highly relevant in this particular context.

that the Commission will have an interest in Centennial's ability to comply with those requirements, Centennial addresses them below.

A. Centennial Is Providing A Five-Year Plan Demonstrating How High-Cost Support Will be Used to Improve Its Coverage, Service Quality and Capacity Throughout The USVI

As Centennial understands the Commission's purpose in calling for a 5-year plan, the Commission seeks assurance that the universal service funds will be used to provide facilities and infrastructure that would not be placed but for the support. The high expense of building and maintaining wireless network facilities in the USVI, combined with the relatively low average income level of the population, make clear that major network upgrades to serve the USVI are not economically feasible without USF support.

Centennial has estimated the amount of universal service funding it will receive upon designation as an ETC, and has developed a 5-year plan that will utilize those funds to improve coverage, service quality, and capacity throughout the USVI. This includes upgrading the capacity and reliability of existing cell sites; adding new cell sites to improve coverage; increasing the reliability of the connectivity between cell sites, and connectivity from cell sites back to Centennial's mobile switching center in Puerto Rico; and increasing the number of retail outlets in the USVI at which customers may obtain supported services, including LifeLine and Link-Up plans. This plan is attached as Exhibit D hereto.¹³

¹³ Note that Centennial's Five-Year Plan is being filed under seal. A request for confidential treatment pursuant to §0.459 of the Commission's rules, is being filed simultaneously herewith. As far as Centennial is aware, the Commission has not yet had occasion to review any prospective ETC's five-year plan under its newly promulgated rules for rural ETC designations. If the Commission would like additional information or clarification with respect to the material Centennial is providing, Centennial would be pleased to provide additional information or explanation.

B. Centennial Is Able To Remain Functional In Emergency Situations

Centennial's has extensive experience in maintaining wireless service during emergencies, and, in particular, severe weather emergencies (hurricanes and tropical storms) of the type that from time to time affect the USVI. Centennial has gained this experience by operating a highly reliable wireless system in Puerto Rico for more than eight years, as well as wireless systems in parts of Mississippi and Louisiana which are, and have been, subject to severe weather. Indeed, following one severe storm in Louisiana, Centennial's was the only network that remained functional — including large portions of the landline network.

Of course, one purpose of universal service funding is to ensure the availability of supported services even during emergencies. To that end, as noted above, Centennial plans to use some of the funds it will receive as an ETC to take steps to improve the reliability and survivability of its network. For example, it plans to complete an undersea fiber optic cable link between the Virgin Islands and Puerto Rico that will be better able to remain functional in severe weather conditions than the current microwave link.

C. Centennial Will Satisfy Consumer Protection And Quality Standards.

As an original signatory to the CTIA Consumer Code for Wireless Service, Centennial is committed to satisfactory customer service and quality. Centennial is committed to providing quality service to customers throughout the USVI and will comply with the requirements established in the *Virginia Cellular Order*.¹⁴ When a potential customer requests service within its existing network, Centennial will provide service immediately. If a potential customer requests service within Centennial's licensed service area, but outside its existing network coverage, Centennial will take the following steps, as necessary, to provide service: (1) evaluate

¹⁴ *Virginia Cellular Order* at ¶¶ 15, 46.

whether the requesting customer's equipment can be modified or replaced to provide service; (2) evaluate whether adjustments can be made to the nearest cell site to provide service; (3) evaluate whether adjustments that can be made to the existing network or customer facilities to provide service; and (4) evaluate whether an additional cell site, cell extender, or repeater can be deployed or constructed to provide service. If, after taking these steps, Centennial still is not able to provide service, it will notify the requesting party and include that information in an annual report to be filed with the Commission detailing how many requests for service were unfulfilled for the past year.

D. Centennial Will Offer Local Usage Plans Comparable To Those Offered By The Incumbent Local Exchange Carrier In the USVI.

Since Centennial operates its Puerto Rico and USVI systems on an integrated basis, its USVI customers will automatically receive "local" calling privileges that include all of Puerto Rico as well as all of the USVI. Because Centennial's calling plans include Puerto Rico and large nationwide buckets of minutes, Centennial offers a larger local calling area than the landline local telephone company. Centennial believes that this large calling scope will be highly beneficial to USVI users. In this regard, Centennial notes that the medical facilities on Puerto Rico are more advanced than those in the USVI, and that it is not at all uncommon for USVI residents to travel to Puerto Rico for medical treatment or other services. Centennial's service will not only allow USVI residents to be reached while traveling in Puerto Rico, it will also allow USVI residents traveling in Puerto Rico for medical care or otherwise to call back to their families and friends in the USVI at no additional charge.

E. Centennial Acknowledges That It May Be Required To Provide Equal Access If All Other ETCs in the USVI Relinquish Their Designations.

Centennial does not view it to be likely that Vitelco would relinquish its ETC status in the USVI. That said, Centennial understands that if that were to occur, and if there were no other ETCs in the USVI, then Centennial may be required to provide equal access to its customers. If that unlikely event were to occur, Centennial reserves the right to propose alternative approaches for handling this requirement.

V. DESIGNATION OF CENTENNIAL AS AN ETC FOR THE USVI IS IN THE PUBLIC INTEREST.

Before designating an additional ETC for an area served by a rural telephone company, the Commission must find that the designation is in the public interest. 47 U.S.C. §214(e)(6). Because Centennial is seeking designation in an area served by a rural local exchange carrier, the Commission must consider public interest factors prior to designating Centennial as an ETC.

Designating Centennial as an ETC will benefit residents of the USVI in many ways. Centennial's service offerings provide many unique advantages to USVI consumers, including but not limited to, the following:

- A. *Mobility* — Centennial's customers can use their service throughout the USVI, as well as in Puerto Rico (where many USVI residents travel for medical care and other services).
- B. *Safety* — Centennial's service offers significant public safety benefits. Customers can make safety-related calls, including calls to 911, not only from their homes, but also from their cars and places of work.
- C. *Usage* — Centennial's service offers local and long distance all on one bill with large buckets of minutes included in the rate plan. Currently, substantially all rate

plans available for Puerto Rico are available for USVI and calls from USVI to Puerto Rico are considered local calls.

- D. *Large Calling Area* — Because Centennial's calling plans include Puerto Rico and large nationwide buckets of minutes, Centennial offers a larger local calling area than the landline local telephone company. Customers needing to call Puerto Rico to make arrangements for medical care, travel, etc. — or, indeed, needing to call the continental United States for such reasons — can do so without incurring toll charges.
- E. *Advanced Services* — Deployment of third generation cellular technology will enable the Centennial to introduce wireless data and other advanced services in the USVI (including Short Messaging Service (SMS) and Multi Media Services (MMS)), which will allow customers to transmit and receive text, audio, and video).
- F. *Competition* — Designating Centennial as an ETC will bring to consumers the benefits of competition, including increased choices, higher quality service and lower rates. In a competitive market, consumers will be able to choose the services that best meet their communications needs. Without a choice of service providers, the consumer is unable to select a provider based on service quality, service availability and rates. Without competition, the incumbent provider has much more limited incentives to introduce new, innovative, or advanced service offerings.

In the context of making the requisite public interest determination, in the *Virginia Cellular Order*, the Commission indicated that it would consider the benefit of increased competitive choice, the impact of the designation on the USF, unique advantages and disadvantages of Centennial's service offerings, commitments regarding quality of service, and

Centennial's ability to serve the designated areas within a reasonable time frame.¹⁵ The discussion immediately above, and in Section IV, *supra*, addresses each of these factors.¹⁶

As described in more detail in the 5-year plan, Centennial currently provides service in the USVI using 16 cell sites, linked back to Centennial's Puerto Rico switching systems by means of microwave links and underwater fiber optic cable connecting the USVI with Puerto Rico. Centennial will use the USF support it will receive as an ETC to undertake a number of network improvements. For example, reconfiguration of Centennial's existing network will improve coverage and capacity and enable the company to provide quality service to customers whose location makes them difficult to serve. As one would expect in a rural area with a significant number of customers that qualify for Lifeline and/or Link Up support, in the absence of universal service funding, the economic case for providing this extended and enhanced coverage is quite difficult to make. The basic objective of universal service funding is to provide support to build out and maintain a robust communications infrastructure in areas where normal market forces might not reliably lead to that result. This objective will plainly be met by designating Centennial as an ETC in the USVI. Although Centennial's build-out plans will

¹⁵ *Virginia Cellular Order* at ¶ 28.

¹⁶ Clearly, the impact on the fund as a whole of designating Centennial as an ETC for the USVI will be tiny. As discussed above, Centennial estimates that if the Commission designates it as an ETC in the USVI, it will receive at least \$1.2 million per year from the USF. To place that amount in context, total federal USF disbursements for 2004 were over \$3 billion. Clearly, therefore, the impact of the disbursement of USF funds to Centennial from its USVI ETC designation is insignificant when compared to the total value of the federal USF fund. Centennial's receipt of funds will not have an adverse impact on the federal USF. The *ETC Order* suggests that a relevant factor in this regard is not the actual impact on the fund as a whole, but rather per-line support amounts. *See ETC Order* at ¶¶ 54-55. There is no question that the ILEC in the USVI receives substantial per-line USF support, and that, therefore, Centennial would as well. Centennial notes, however that providing robust wireless service in the USVI is quite challenging economically, due to the mountainous terrain in much of the islands; due to the extremely severe weather conditions to which the wireless network will from time to time be subject; and due to the relative remoteness and insularity of the USVI. Thus, this factor should not deter the Commission from granting Centennial's petition.

continue to evolve over time, Centennial will respond to consumer demand by taking additional steps to ensure quality coverage and service.

VI. REGULATORY OVERSIGHT.

A. High-Cost Certification.

ETCs are obliged under Section 254(e) to use federal universal service support “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended” and are required under Sections 54.313 and 54.314 of the Commission’s rules to certify compliance with this requirement on an annual basis.¹⁷ Centennial will use all federal USF support only for the provision, maintenance, and upgrading of facilities and services for which support is intended pursuant to Section 254(e) of the Act. *See* Exhibit E attached hereto. Centennial requests that the Commission find that it has met the high-cost certification requirement and is entitled to begin receiving support as of its ETC designation date.

B. Annual Certification and Reporting Requirements

In accordance with the requirements set forth in the *ETC Order*,¹⁸ Centennial commits to comply with additional reporting requirements to allow the Commission to ensure that Centennial is satisfying its obligation under Section 214(e) of the Act to provide supported services throughout the USVI. As an ETC, Centennial will submit to the Commission and the Universal Service Administrative Company, records and documentation, on an annual basis, detailing: (1) its progress towards meeting its build-out plans in the USVI; (2) its outages in the USVI lasting at least 30 minutes that potentially affect at least 10 percent of end users in Centennial’s service area, or that potentially affects a 911 special facility; (3) the number of requests for service from potential customers in the USVI that were unfulfilled during the past

¹⁷ 47 C.F.R. § 54.313, 54.314.

¹⁸ *ETC Order*, *supra* ¶¶ 68-70.

year, including a description of how Centennial attempted to provide service to those customers; and (4) the number of complaints it receives per 1,000 mobile handsets in the USVI. Centennial will also provide the Commission and USAC with certification that it (1) continues to satisfy consumer protection and quality standards and to comply with the CTIA Consumer Code for Wireless Service; (2) maintains the ability to remain functional in emergency situations; (3) continues to offer a local usage plan comparable to that offered by the local incumbent LEC in the USVI; and (4) acknowledges that it may be required to provide equal access to its customers if the incumbent LEC relinquishes its ETC status and there are no other ETCs in the USVI.

VII. ANTI-DRUG ABUSE CERTIFICATION.

Centennial certifies that no party to this Petition is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.¹⁹ *See* Exhibit F attached hereto.

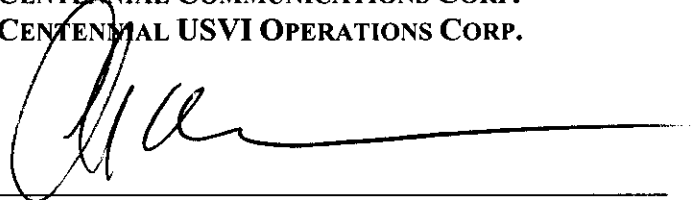
¹⁹ 47 C.F.R. §1.2002 (a); 21 U.S.C. §862.

VIII. CONCLUSION.

Centennial respectfully requests the Commission (1) designate it as an ETC in the USVI and; (2) find that Centennial has met the high-cost certification requirements of Sections 54.313 and 54.314 of the rules and is therefore entitled to begin receiving high-cost support as of the date of its ETC designation.

Respectfully submitted,

CENTENNIAL COMMUNICATIONS CORP.
CENTENNIAL USVI OPERATIONS CORP.



Of Counsel:
William Roughton
Vice President
Legal and Regulatory Affairs
Centennial Communications Corp.

By: Christopher W. Savage
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Washington, D.C. 20006
Tel: (202) 659-9750
Fax: (202) 452-0067
Its Attorneys

Dated: April 29, 2005

Virgin Islands Public Services Commission

P. O. Box 7360, Sunny Isle - Christiansted, St. Croix - U.S. Virgin Islands 00823-7360
Telephone (340) 778-6010 Fax (340) 778-0302

April 19, 2005

The Honorable Kevin Martin
Chairman, Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Designation of Centennial Communications Corporation as an Eligible
Telecommunications Carrier

Dear Chairman Martin:

By letter of February 17, 2005, Centennial Communications Corporation ("Centennial"), a provider of wireless telephone services in the U.S. Virgin Islands, advised the V.I. Public Services Commission ("VIPSC") that it intended to seek designation as an eligible telecommunication carrier, or "ETC," pursuant to the provisions of 47 U.S.C. Section 214(e). The VIPSC recently concluded a proceeding in which it considered whether it should grant ETC designation to another wireless service provider, Choice Communications L.L.C. ("Choice"). The VIPSC concluded that, because Choice was a wireless carrier, held no operating licenses or other authority from the PSC, and was subject to no reporting requirements under the V.I. Code, the PSC lacked jurisdiction to consider Choice's request for ETC designation. It provided Choice with a letter to the FCC dated February 27, 2004 (attached), declining jurisdiction and permitting Choice to seek this designation from the Federal Communications Commission ("FCC").


At its April 8, 2005 public meeting, the VIPSC voted to issue Centennial a similar letter. Centennial has advised that, like Choice, it is a wireless carrier operating under the authority of an FCC license, holds no operating licenses or other authority from the VIPSC, and is subject to no requirements under the V.I. Code that make reports to the VIPSC. The VIPSC has therefore concluded that it lacks jurisdiction under 47 U.S.C. Section 214(e)(6) to consider Centennial's request for ETC designation. This determination shall not be deemed a waiver of the VIPSC's right to exercise its rightful authority under any future law of the Virgin Islands, or in any future proceeding where an independent basis for jurisdiction exists.

The Honorable Kevin Martin, Chairman
Federal Communications Commission
April 19, 2005, Page 2

The conclusion by the VIPSC that it lacks jurisdiction in this matter should not be construed as any indication of the VIPSC's opinion regarding the merits of Centennial's request. We understand that the FCC will develop its own evidentiary record and make its own independent determination in this matter. In the event that the FCC desires any information from the VIPSC in making this determination, we stand ready to assist in any way we can. Please feel free to contact our office if we can be of further assistance.

Sincerely,

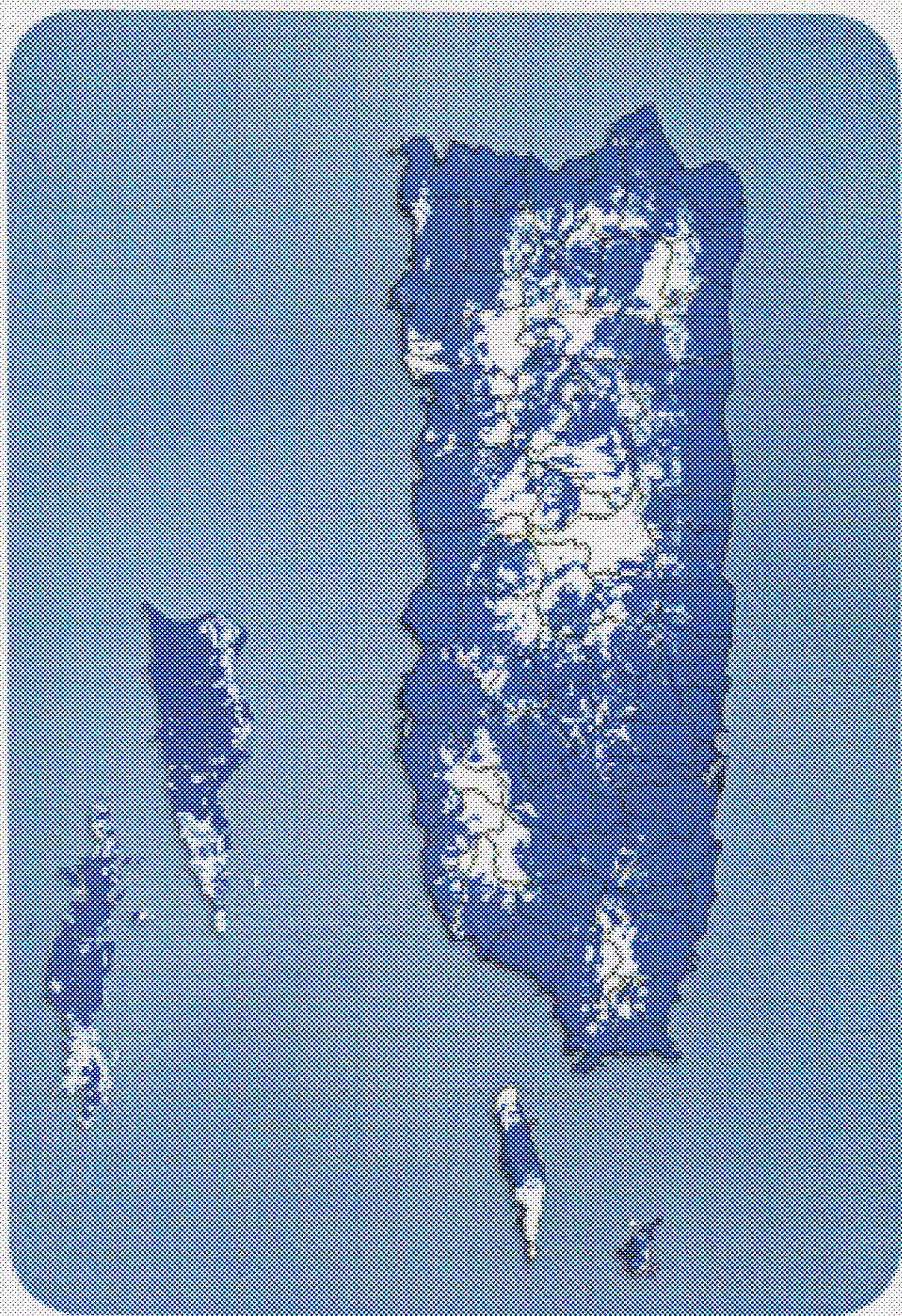
VIRGIN ISLANDS PUBLIC SERVICES COMMISSION



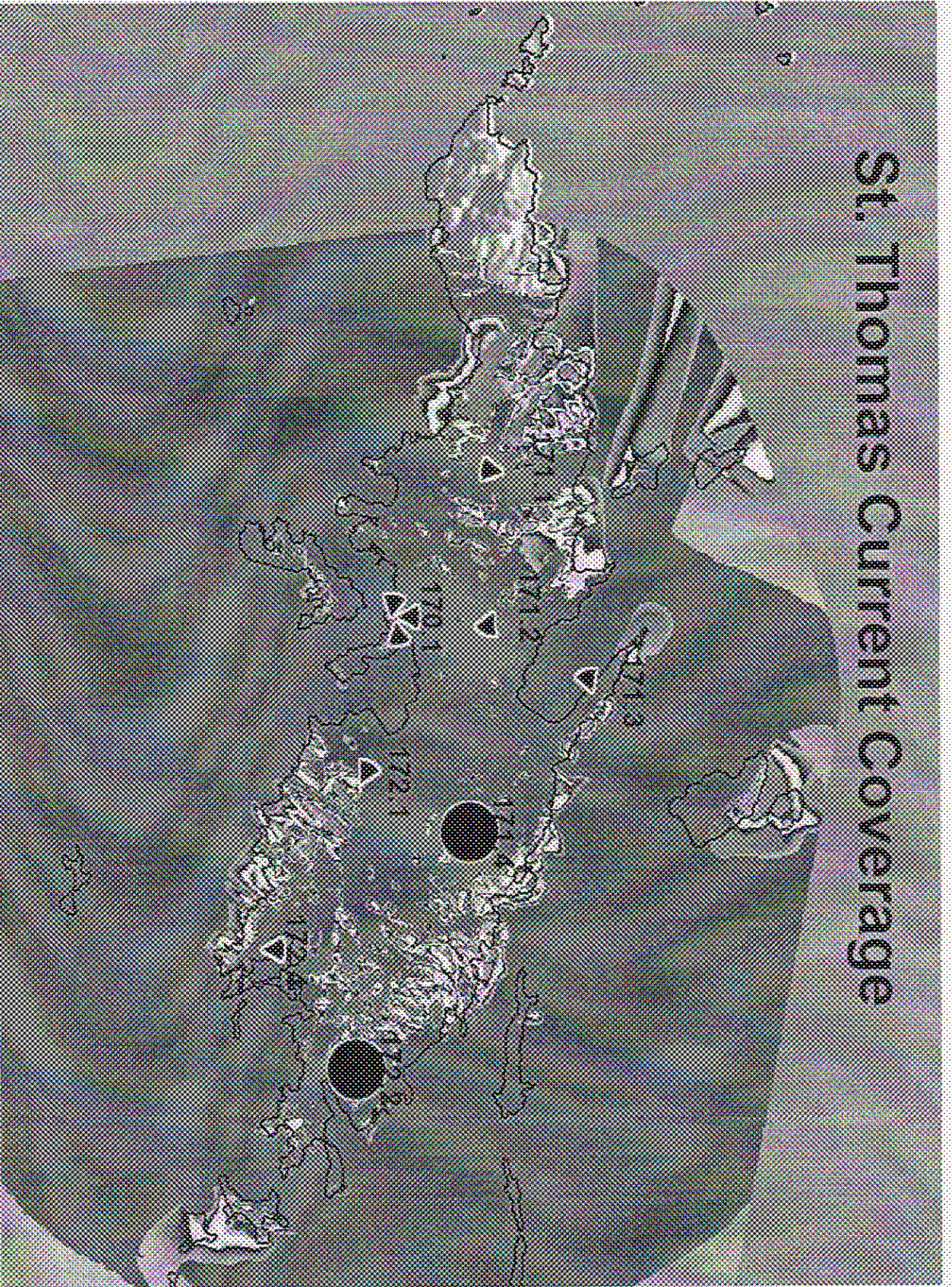
Valencio Jackson
Chairman

Enclosure.

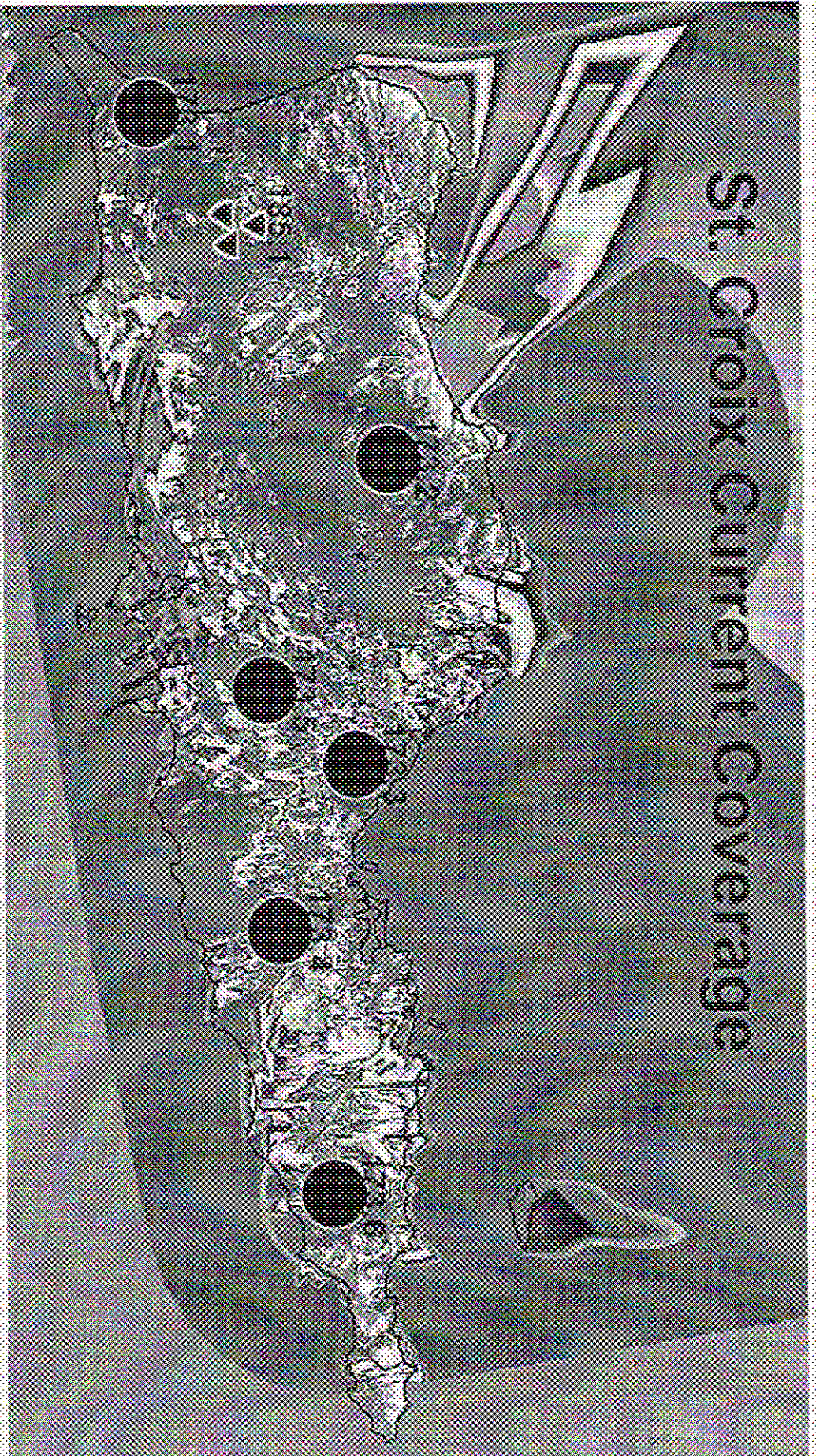
Exhibit A



St. Thomas Current Coverage



St. Croix Current Coverage



St. John Current Coverage

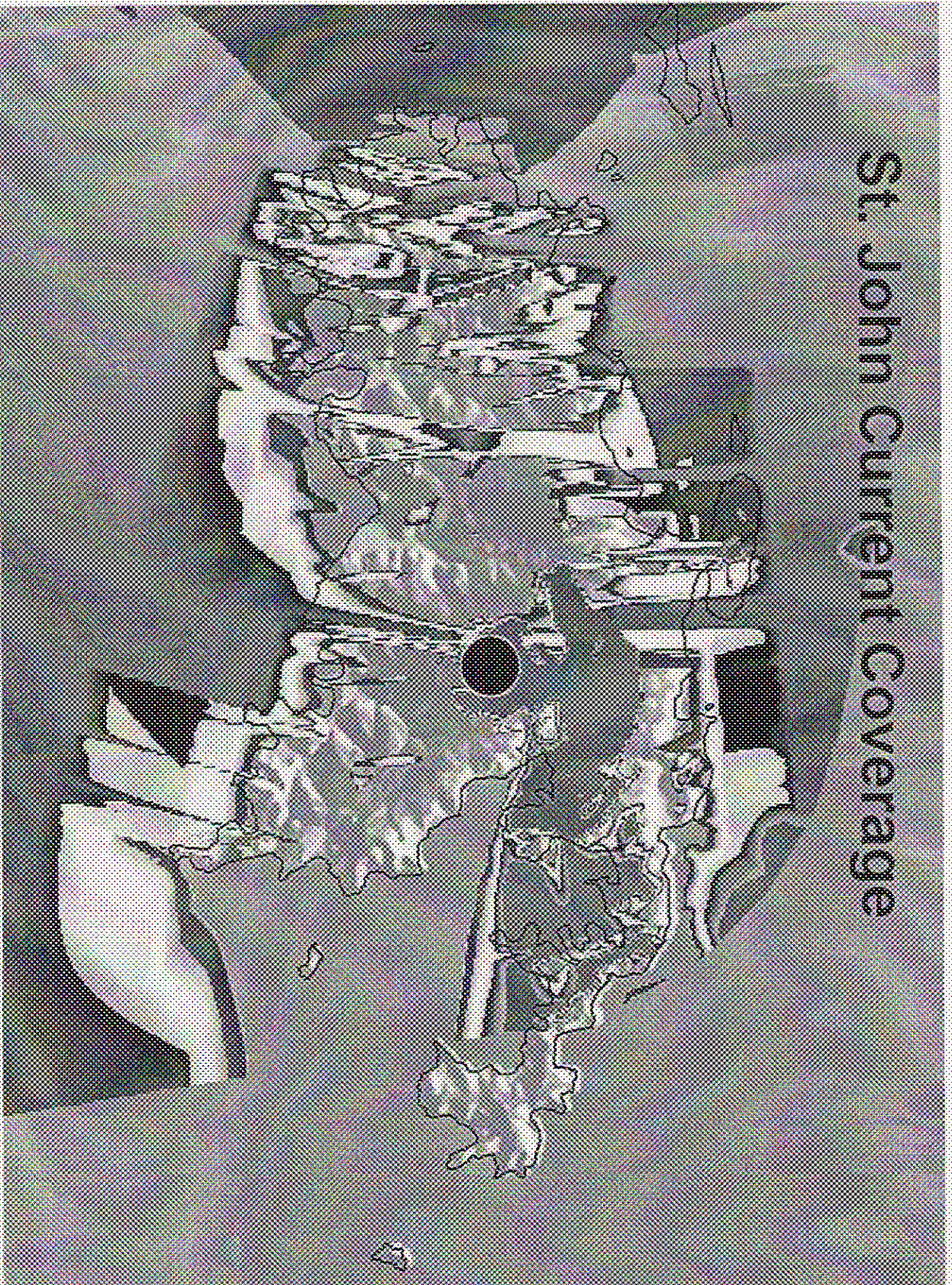


Exhibit B

DECLARATION UNDER PENALTY OF PERJURY

I, William Roughton, do hereby declare under penalty of perjury as follows:

1. I am the Vice President, Legal and Regulatory Affairs for Centennial Communications Corp., parent company of Centennial USVI Operations Corp. ("Centennial").

2. This Affidavit is submitted in support of Centennial's Petition for Designation as an Eligible Telecommunications Carrier ("ETC") in the United States Virgin Islands (the "USVI").

3. Centennial currently provides PCS service throughout the USVI.

4. As a carrier not subject to the jurisdiction of the USVI Public Service Commission, Centennial is seeking designation as an ETC under Section 214(e)(6).

5. Centennial meets the criteria for ETC designation as explained herein.

6. Centennial is a "common carrier" for purposes of obtaining ETC designation pursuant to 47 U.S.C. §214(e)(1). A "common carrier" is generally defined in 47 U.S.C. §153(10) as a person engaged as a common carrier on a for-hire basis in interstate communications by wire or radio. Section 20.9(a)(7) of the Commission's Rules provide that cellular service is a common carrier service. *See* 47 C.F.R. §20.9(a)(7).

7. Centennial currently offers and is able to provide, within its FCC-licensed service area in the USVI, which includes St. Thomas, St. John, and St. Croix, all of the services and functionalities identified in 47 C.F.R. §54.101(a). Each of these services and functionalities is discussed more fully below.

a. Voice-Grade Access To The Public Switched Telephone Network. The FCC has defined voice grade access as "a functionality that enables a user of telecommunications service to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating that there is an incoming call. Bandwidth for voice grade access should be, at a minimum, 300 to 3000 Hertz." 47 C.F.R. § 54.101(a)(1). Centennial provides voice grade access to the PSTN by means of its various interconnection agreements with Vitelco and with the Puerto Rico Telephone Company, as well as its provision of access services to long distance carriers.

b. Local Usage. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. The Commission defines local usage as "an amount of minutes of use of exchange service, prescribed by the Commission, provided free of charge to end users." 47 C.F.R. 54.101 (a)(2). A carrier seeking ETC designation is not required to offer unlimited local usage and the FCC has not established a minimum amount of local usage required to be included in a universal service offering. Centennial offers a variety of rate plans in the USVI that provide local usage.

c. Dual-Tone, Multi-Frequency ("DTMF") Signaling, or its Functional Equivalent. DTMF is defined as "a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time." 47 C.F.R. § 54.101(a)(4). Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement. Centennial currently uses out-of-band digital signaling and in-band multi-frequency ("MF") signaling that is functionally equivalent to DTMF signaling. Centennial also has the ability to pass DTMF signaling over its CDMA system. Centennial therefore meets the requirement to provide DTMF signaling or its functional equivalent.

d. Single-Party Service or its Functional Equivalent. Single-party service or its functional equivalent is defined as a "telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission." 47 C.F.R. § 54.101(a)(4). Centennial provides single-party service or its equivalent by providing a dedicated message path for the length of all customer calls.

e. Access to Emergency Services. Access to emergency services "includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems." 47 C.F.R. § 54.101(a)(5). Centennial currently provides all of its customers with access to emergency service by dialing 911 in satisfaction of this requirement, and is implementing E911 services consistent with the Commission's rules. To date, no public emergency service provider in the USVI has made a request for either Phase I or Phase II E911 service.

f. Access to Operator Services. Access to operator services is defined as "access to an automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call." 47 C.F.R. § 54.101(a)(6). Centennial provides access to operator services through itself or other entities. Centennial currently has an arrangement with Verisign, an outside contractor, which provides automated operator assistance services, pursuant to which a customer can dial "0" and receive automated assistance to place a call with a credit card, calling card or prepaid card, or make a collect call. A customer may also dial "611" and be connected to a representative of Centennial's call center, who can place the call for the customer.

g. Access to Interexchange Service. Access to interexchange service is defined as "the use of the loop, as well as that portion of switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network." 47 C.F.R. § 54.101(a)(7). Centennial provides all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with several IXCs. Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code.

h. Access to Directory Assistance. Access to directory assistance is defined as "access to a service that includes, but is not limited to, making available to customers, upon

request, information contained in directory listings." 47 C.F.R. §54.101(a)(8). Centennial provides its customers with access to directly assistance by dialing "411" or "555-1212."

i. Toll Limitation for Qualifying Low-Income Consumers. An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no charge. 47 C.F.R. §54.101(a)(9) and §54.401(3). Once designated as an ETC, Centennial will offer toll blocking limitation services to Lifeline customers in satisfaction of the Commission's requirement. Currently, Centennial provides toll-blocking services for international calls and customer selected toll calls. Accordingly, Centennial has the technology to provide toll blocking and will use this technology to offer the service, at no charge, to Lifeline customers.

8. Centennial will provide the supported services using its own facilities and its existing network infrastructure, which includes the same antenna, cell-site, tower, trunking, mobile switching and interconnection facilities used by Centennial to serve its PSC customers.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 29, 2005.

Centennial USVI Operations Corp.

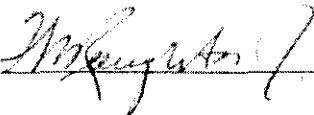
By:  _____

Exhibit C

New B-Simple Plan Description:

- A one time set up fee of \$35 applies, that includes:
 - . \$20 - Activation Fee
 - . A bonus of 100 free anytime minutes.
 - . Free access to voicemail (the retrieval of the messages is also free) and calling features.
 - . 2 plan options- Customer can choose between:
 - B-Simple GO! Plan: Voice plan plus unlimited Go Text and Go Info for an additional daily charge of 25¢.
 - B-Simple Plan: Voice plan without Go Text and Go Info data services.

B-Simple:

Recharge amount	Per minute Cost	Nights and Weekends	Incoming calls	Long distance to US	Roaming	Voicemail	Calling features
\$25.00	\$0.16	10¢	10¢	15¢	N/A	Free	Free
\$50.00	\$0.125	10¢	10¢	15¢	N/A	Free	Free
\$100.00	\$0.10	10¢	10¢	15¢	N/A	Free	Free

B-Simple Go:

Recharge amount	Per minute cost	Unlimited Go Text and Go Info	Nights and Weekends	Incoming calls	Long distance to US	Roaming	Voicemail	Calling features
\$25.00	\$0.16	Daily Charge 25¢	10¢	10¢	15¢	N/A	Free	Free
\$50.00	\$0.125	Daily charge 25¢	10¢	10¢	15¢	N/A	Free	Free
\$100.00	\$0.10	Daily charge 25¢	10¢	10¢	15¢	N/A	Free	Free

- . Nights and Weekends: Nights: Monday through Friday from 10pm to 5:59 am. Weekends from Friday from 10:00pm until Monday at 5:59am.
- . Calling Features includes: call waiting, conference call, call restriction and caller ID. Call transfer is not available.
- . Mobile to mobile calls will be charged at the regular rate per minute depending on the recharge.
- Long Distance calls (USA & International) will be charged at the regular per minute long distance tariff plus airtime.
- Dominican Republic and Canada long distance calls are charged at \$0.25 per minute plus airtime.



Wireless Telecommunication Service Offer

BHappY Plan			Choose 1 of these options without additional cost. Add 1 more for an extra \$9.99 a month.						
Monthly Cost	Minutes Included	Mobile to Mobile	Unlimited Incoming Calls	Unlimited Nights & Weekends*	Unlimited Long Distance to U.S. & Canada*	Cost of Additional Minute	Cost of Minute Long Distance to U.S. & Canada	Cost of Minute Roaming U.S. & Canada	Additional Line
<input type="radio"/> \$49.95 <input type="radio"/> \$69.95 <input type="radio"/> \$89.95	900 1200 1800	Included	<input type="radio"/> Included <input type="radio"/> \$9.99	<input type="radio"/> Included <input type="radio"/> \$9.99	<input type="radio"/> Included <input type="radio"/> \$9.99	25¢	10¢	50¢	\$19.99

Perfect Plan									
Monthly Cost	Minutes Included	Mobile to Mobile	Unlimited Incoming Calls	Unlimited Nights & Weekends*	Unlimited Long Distance to U.S. & Canada	Cost of Additional Minute	Cost of Minute Long Distance to U.S. & Canada	Cost of Minute Roaming U.S. & Canada	GO-Txt Text Messages
<input type="radio"/> \$49.99	800	Included	Included	Included	<input type="radio"/> \$9.99	25¢	10¢	50¢	Free for 2 months [▲]

Options & Services (at additional cost)

- ☐ Voice mail*

☐ Caller ID, call waiting, call transfer, conference call, restricted call, and ID block

☐ Detailed billing

☐ "NO WORRY" phone insurance

☐ Unlimited long distance calls to the U.S. & 10¢ per minute to the Dominican Republic

☐ Roaming plans

☐ Road assistance (2DRescue Program) **1 MONTH FREE***

☐ Sending of short text messages (GO-Txt)[▲]

☐ E-mail through your phone

☐ Fast Access to the Internet

☐ Data Transmission

☐ E-bill (online billing)

☐ EZ Pay (automatic charge to a credit card)

☐ Other options

Aproximate Recurring Monthly Charges*

REFERRALS PLAN:

- ☐ Equipment (brand & model)

\$

☐ Activation

\$

Date: _____ Representative: _____ Telephone: _____
(Offer valid for 15 days)

•Nights are from Monday through Friday, from 10:00 p.m. to 5:59 a.m., and weekends are from Friday 10:00 p.m. to Monday 5:59 a.m. •The time used will be deducted from the minutes plan.
 ▲Free for the first month; \$3.50 a month will be invoiced from the second month on. ▲Free for the first two months; \$3 per month will be charged from the third month on. *This amount does not include the following recurring taxes and charges: (1) Gross Receipts Tax equal to 5.98% of monthly charges related to local service, (2) Federal Universal Service Fund Charge equal to 10.7% of monthly charges related to interstate and international service, (3) Interconnection Fee of \$1.76, and Regulatory Programs Fee of \$1.25 per phone. The charges and recurrent taxes mentioned above are subject to change without notice. Other charges may apply. Does not apply to corporate accounts, Alcantare/InTouch prepaid service or in combination with other offers. We reserve the right to change or modify this offer without prior notice. A deposit may be required. Requires credit approval and a fixed term contract. Offer valid only in the U.S. Virgin Islands. Certain restrictions apply. Centennial is a company committed to the privacy rights of its clients and complies with all applicable laws and rules.

Exhibit D

(Filed Under Seal)


CONFIDENTIAL

Exhibit E

Centennial USVI Operations Corp.

HIGH-COST CERTIFICATION

I, William L. Roughton, Jr., on behalf of Centennial USVI Operations Corp. ("Centennial") and under penalty of perjury, hereby certify that all high-cost support provided to Centennial will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996, 47 U.S.C. §254(e).


William L. Roughton, Jr.
Vice President
Legal and Regulatory Affairs

SUBSCRIBED, SWORN AND ACKNOWLEDGED before me this 29th day of April, 2005.


NOTARY PUBLIC

KAREN K. GROSCHEL
NOTARY PUBLIC STATE OF NEW JERSEY
MY COMMISSION EXPIRES 01-16-2010

My Commission Expires: _____

Exhibit F

DECLARATION UNDER PENALTY OF PERJURY

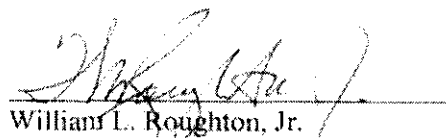
I, William L. Roughton, Jr., do hereby declare under penalty of perjury as follows:

1. I am Vice President, Legal and Regulatory Affairs, for Centennial Communications Corp., parent company of Centennial USVI Operations Corp. (collectively "Petitioner").

2. To the best of my knowledge, the Petitioner referred to in the foregoing Petition, including all officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non voting) of the applicant as specified in 1.2002(b) of the Commission's rules, are not subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862.

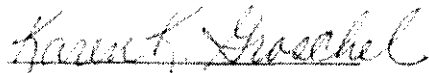
3. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 29, 2005.



William L. Roughton, Jr.
Vice President
Legal and Regulatory Affairs
Centennial Communications Corp.

SUBSCRIBED, SWORN AND ACKNOWLEDGED before me this 29th day of April, 2005.



NOTARY PUBLIC

KAREN K. GROSCHEL
NOTARY PUBLIC STATE OF NEW JERSEY
MY COMMISSION EXPIRES 01-16-2010

My Commission Expires: _____